

STATE OF WASHINGTON
**OFFICE OF
INSURANCE COMMISSIONER**
**BEFORE THE INSURANCE COMMISSIONER
OF THE STATE OF WASHINGTON**

☐ The orders posted here are unverified electronic duplicates of the official orders actually entered. To be certain you have the official version of the order as entered, you should request a hard copy of the official version from the Commissioner's Public Disclosure Officer, Steve Carlsberg, 360-586-0691, or by e-mail: stevec@oic.wa.gov.

In the Matter of)	No. D 2000-19
THE HARTFORD GROUP, HARTFORD ACCIDENT & INDEMNITY COMPANY, HARTFORD CASUALTY INSURANCE COMPANY, HARTFORD UNDERWRITERS INSURANCE COMPANY, TWIN)	CONSENT ORDER LEVYING A FINE
CITY FIRE INSURANCE COMPANY, HARTFORD INSURANCE COMPANY OF THE MIDWEST, and HARTFORD FIRE INSURANCE COMPANY,)	
Authorized Insurers)	

FINDINGS OF FACT:

- On August 23, 1999, Mr. James Antush, Actuarial Analyst with the Office of the Insurance Commissioner ("OIC") wrote to Ms. Elsie Rodriguez, Senior Design Analyst of the Hartford Insurance Group, disapproving The Hartford Insurance Group's filing number FN.05HS.100.1999.11, in which The Hartford Insurance Group attempted to add Property and Casualty Insurance Company of Hartford to the list of Hartford companies adopting the Insurance Services Office's ("ISO") commercial inland marine loss costs, namely Hartford Accident & Indemnity Company, Hartford Casualty Insurance Company, Hartford Underwriters Insurance Company, Twin City Fire Insurance Company, Hartford Insurance Company of the Midwest, and Hartford Fire Insurance Company.

2. In that August 23, 1999 letter, Mr. Antush also asked several questions about which ISO loss costs filings were actually being used by the above-referenced members of The Hartford Group.
3. On or about November 17, 1999, Ms. Rodriguez contacted Mr. Antush and stated that the Hartford wanted to withdraw the filing. Mr. Antush responded that no formal withdrawal was necessary as the filing was denied. No response to the questions in the August 23, 1999 letter was received by OIC.
4. On December 2, 1999, Mr. Antush wrote to Ms. Rodriguez expressing OIC concerns about the apparent non-adoption by The Hartford Insurance Group of ISO's loss cost filing number CM-96-RLA1.
5. In his December 2, 1999 letter, Mr. Antush again asked questions about The Hartford Group's past use of ISO loss costs, specifically whether the loss costs in ISO filing number CM-96-RLA1 were ever used by the relevant members of The Hartford Group and, if not, Mr. Antush asked for a list of all commercial inland marine policies issued or renewed in Washington with effective dates on or after November 1, 1996, sorted by effective date, displaying the effective date, policy number, insured name, and written premium.
6. In his December 2, 1999 letter, Mr. Antush warned that this inquiry was subject to the provisions of WAC 284-30-650, which required a complete response within fifteen business days from the date of receipt of the inquiry.
7. On or about December 30, 1999, Hartford contacted Mr. Antush and indicated that it was in the process of gathering the information that was responsive to the request. No response to the inquiries in the December 2, 1999 letter was received by OIC.
8. During the week beginning January 31, 2000, Mr. Antush telephoned Ms. Rodriguez to determine why no response to his December 2, 2000 inquiry had been received by OIC. Ms. Rodriguez explained that Mr. Antush's inquiry had been sent to the "actuarial unit," which, Ms. Rodriguez reported, was working on a response. Mr. Antush explained again the gravity of a failure to respond in a timely manner, but Ms. Rodriguez stated that the situation was out of her control.

CONCLUSIONS OF LAW

1. By its failures to respond fully to OIC's August 23, 1999 inquiry and its December 2, 1999 inquiry within fifteen business days of their receipt, The Hartford Insurance Group committed a minimum of two violations of WAC 284-30-650.

CONSENT TO ORDER

The Hartford Insurance Group hereby admits to the foregoing Findings and Conclusions.

The Commissioner has offered a settlement in lieu of suspending or revoking the certificates of authority of the involved members of The Hartford Insurance Group, i.e., Hartford Accident &

Indemnity Company, Hartford Casualty Insurance Company, Hartford Underwriters Insurance Company, Twin City Fire Insurance Company, Hartford Insurance Company of the Midwest, and Hartford Fire Insurance Company.

By agreement of the parties, the OIC will impose a fine of \$20,000 on The Hartford Insurance Group, and suspend \$10,000 of the fine on condition that The Hartford Insurance Group provide OIC with the information requested in Mr. Antush's December 2, 1999 letter by close of business on March 1, 2000.

EXECUTED and AGREED this _____ day of _____, 2000.

THE HARTFORD INSURANCE GROUP

Title: _____

Signed: _____

ORDER

Pursuant to RCW 48.05.185, the Insurance Commissioner hereby imposes a fine of Twenty Thousand Dollars, with Ten Thousand Dollars suspended, upon The Hartford Insurance Group. This fine must be paid in full within thirty days of the date of entry of this order. Failure to pay the fine or fulfill the stated condition within the allotted time shall constitute grounds for recovery of the full fine, including the suspended portion, and for revocation of Hartford Accident & Indemnity Company, Hartford Casualty Insurance Company, Hartford Underwriters Insurance Company, Twin City Fire Insurance Company, Hartford Insurance Company of the Midwest, and Hartford Fire Insurance Company's certificates of authority in a civil action brought on behalf of the Insurance Commissioner by the Attorney General of the State of Washington.

ENTERED AT OLYMPIA, WASHINGTON, this _____ day of _____, 2000.

DEBORAH SENN

Insurance Commissioner

By: _____

Carol Sureau
Office of the Insurance Commissioner

Enforcement Attorney

